



**DEPARTMENT OF THE TREASURY**  
**INTERNAL REVENUE SERVICE**  
**WASHINGTON, D.C. 20224**

MEMORANDUM FOR: JOHN STAPLES  
ASSOCIATE CHIEF COUNSEL (INTERNATIONAL)

FROM: Mindy S. Piatoff, Acting APA Program Director

DATE: January 16, 2003

SUBJECT: APA Quarterly Report for FY 2003,  
First Quarter Ending 12/31/02

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The following are the APA Program's results for the first quarter of FY 2003 ("Q1").

**APAs Completed**

The APA Program completed 23 APA matters in Q1. That number consists of 17 bilateral APAs (1 renewal), 4 unilateral APAs (1 renewal) and 2 unilateral amendments.

**Negotiating-Position Papers**

The APA Program completed 14 bilateral negotiating position papers in Q1, three of which involved a renewal APA request.

**Other**

Three (3) taxpayers withdrew APA requests in Q1, all of which were bilateral. One (1) taxpayer changed its unilateral APA to a bilateral APA

**Annual Reports**

The APA Program completed its review of, and closed 68 annual reports in Q1.

**New Matters**

The APA Program received 30 new APA matters in Q1. Twelve of the 30 new matters are bilateral. Five of the 12 bilateral matters involved renewals. Eighteen of the new matters are unilateral. Five of the 18 unilateral matters involve a renewal and one is an amendment.

## APA Inventory

The APA Program has an ending inventory of 203 open matters.<sup>1</sup> This consists of 155 bilateral and 48 unilateral matters.<sup>2</sup>

Attached for your information is the APA issuance report and open inventory reports as of December 31, 2002. Please contact Mindy Piatoff at (202) 874-5620 if any additional information is required.

Respectfully submitted,

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Mindy S. Piatoff  
Acting APA Program Director

### Attachments

cc: LMSB Commissioner  
Director, International  
National Director of Appeals  
LMSB Division Counsel

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1. This equals beginning Q1 inventory of 199 matters, plus 30 receipts, less 23 closures and 3 cases withdrawn { $199 + 30 - 23 - 3 = 203$ }.

2. The 203 open matters include 20 pending dollar filings (10 bilateral and 10 unilateral): Thus

\$ The APA Program has an inventory of 183 active cases, i.e., 203 open matters less 20 pending dollar filings.

\$ The 183 active cases consist of 145 bilateral cases (155 total bilateral matters less 10 pending bilateral dollar filings) and 38 unilateral cases (48 total unilateral matters less 10 pending dollar filings).

\$ The APA Program has forwarded 107 of the 145 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 76 cases, consisting of 38 bilateral (145 active bilateral cases less 107 forwarded to Competent Authority) and 38 active unilateral cases.